

Exhibit A

Hon. Thomas S. Zilly

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON**

ESTHER HOFFMAN; SARAH DOUGLASS;) Case No.: 2:18-cv-01132 JCC
 ANTHONY KIM; and IL KIM and DARIA)
 KIM, husband and wife and the marital)
 community comprised thereof, on behalf of) **DECLARATION IN SUPPORT OF DEFENDANTS'**
 themselves and all others similarly situated,) **RESPONSE TO PLAINTIFFS' MOTION TO**
) **REMAND**

Plaintiffs,)

vs.)

) Noted for hearing: August 14, 2020

TRANSWORLD SYSTEMS)
 INCORPORATED; PATENAUDE AND)
 FELIX, A.P.C.; MATTHEW CHEUNG, and)
 the marital community comprised of)
 MATTHEW CHEUNG and JANE DOE)
 CHEUNG, National Collegiate Student Loan)
 Trust 2003-1, National Collegiate Student)
 Loan Trust 2004-1, National Collegiate)
 Student Loan Trust 2004-2, National)
 Collegiate Student Loan Trust 2005-1,)
 National Collegiate Student Loan Trust 2005-)
 2, National Collegiate Student Loan Trust)
 2005-3, National Collegiate Student Loan)
 Trust 2006-1, National Collegiate Student)
 Loan Trust 2006-2, National Collegiate)
 Student Loan Trust 2006-3, National)
 Collegiate Student Loan Trust 2006-4,)
 National Collegiate Student Loan Trust 2007-)
 1, National Collegiate Student Loan Trust)
 2007-2, National Collegiate Student Loan)
 Trust 2007-3, National Collegiate Student)
 Loan Trust 2007-4, National Collegiate Master)
 Student Loan Trust, and DOES ONE)
 THROUGH TEN,)

Defendants.)

DECLARATION IN SUPPORT OF DEFENDANTS'
RESPONSE TO PLAINTIFFS' MOTION TO REMAND

I, Bradley Luke, hereby declare and state:

1. I am over the age of 18 and competent to testify to the matters stated herein.

2. I am employed by Transworld Systems Inc. ("TSI"), the subservicer for National Collegiate Student Loan Trust 2003-1, National Collegiate Student Loan Trust 2004-1, National Collegiate Student Loan Trust 2004-2, National Collegiate Student Loan Trust 2005-1, National Collegiate Student Loan Trust 2005-2, National Collegiate Student Loan Trust 2005-3, National Collegiate Student Loan Trust 2006-1, National Collegiate Student Loan Trust 2006-2, National Collegiate Student Loan Trust 2006-3, National Collegiate Student Loan Trust 2006-4, National Collegiate Student Loan Trust 2007-1, National Collegiate Student Loan Trust 2007-2, National Collegiate Student Loan Trust 2007-3, National Collegiate Student Loan Trust 2007-4, and National Collegiate Master Student Loan Trust I (the "NCSLT Entities"), pertaining to the loans forming the subject matter of this lawsuit. TSI is the post-default servicer and designated custodian of records for the NCSLT Entities. As the post-default servicer, TSI maintains loan history records for NCSLT.

3. I am the Director of Operations for TSI. I have been an employee of TSI since November 2014. From January 2010 until November 2014, I was employed by NCO Financial Systems, Inc. and worked on many of the same client portfolios as I do currently with TSI, including the NCSLT Entities here. I am duly authorized to make the representations contained in this Declaration for and on behalf of the NCSLT Entities and am competent to testify to the matters stated in this Declaration.

4. As an employee of TSI, I am duly authorized by the NCSLT Entities and U.S. Bank, N.A. to make the representations contained in this Declaration.

1 5. TSI has been contracted to perform the duties of the subservicer for the NCSLT
2 Entities by U.S. Bank, N.A., the special servicer of the NCSLT Entities.

3
4 6. The NCSLT Entities are Delaware statutory trusts.

5 7. TSI is a corporation incorporated in California with its principal place of business
6 in Illinois.

7 8. Based on Plaintiffs' "Class Definition" in their Second Amended Complaint, and
8 specifically the "CPA Judgment Subclass", there are approximately 399 potential class members.

9 9. Based upon the 399 potential class members in the CPA Judgment Subclass, the
10 face value of the loans today is \$8.87 million.

11
12 I declare under penalty of perjury under the laws of the United States of America and all
13 other applicable laws in the present proceedings that the following is true and correct.

14 Executed on August 7, 2020.

15
16 
17 Brodley Luke